UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

GEORGE PIO, Individually and on Behalf of All Others Persons Similarly Situated,

Civil Case No. 14-cv-11191

Honorable Linda V. Parker

Plaintiff,

v.

GENERAL MOTORS COMPANY, MARY T. BARRA, DANIEL AMMANN, ALAN S. BATEY, JAMES B. DELUCA, and DANIEL F. AKERSON,

Defendants.

STIPULATION AND ORDER ESTABLISHING NEW CASE CAPTION

New York State Teachers' Retirement System ("Lead Plaintiff"), as the court-appointed lead plaintiff for the putative class, individually and on behalf of all others similarly situated, and Defendants General Motors Company, Mary T. Barra, Daniel Ammann, Alan S. Batey, James B. Deluca, and Daniel F. Akerson (collectively, "Defendants"), by and through their respective undersigned counsel, hereby stipulate to establishing a new case caption in the above-captioned action:

WHEREAS, on October 24, 2014, the Court appointed New York Teachers'

Retirement System as lead plaintiff in this litigation and appointed Bernstein Litowitz Berger & Grossmann LLP as lead counsel;

WHEREAS, on November 4, 2014, pursuant to a stipulation filed by the parties, the Court entered an initial pre-trial schedule in the above-captioned action, pursuant to which Lead Plaintiff must file and serve a consolidated securities class action complaint (the "Complaint") on or before January 15, 2015;

WHEREAS, in connection with the Complaint, Lead Plaintiff has determined to remove James B. DeLuca and Alan S. Batey as individual defendants in the above-captioned action (the "Former Defendants");

WHEREAS, given the appointment of Lead Plaintiff and the removal of the Former Defendants, and without prejudice to any arguments as to the propriety of the claims asserted against the Defendants, the parties respectfully submit that the best interests of the Court and the parties will be served by updating the caption of the above-captioned action to accurately reflect the parties thereto;

NOW THEREFORE, Lead Plaintiff and Defendants, by and through their respective counsel, agree and stipulate to the following:

1. The caption of the above-captioned action shall be changed to the caption set forth on the attached Exhibit A.

STIPULATED AND AGREED BY:

/s/ Salvatore J. Graziano

Salvatore J. Graziano

James A. Harrod

Adam Wierzbowski

Rebecca E. Boon

BERNSTEIN LITOWITZ

BERGER & GROSSMANN LLP

1285 Avenue of the Americas New York, NY 10019

Telephone: (212) 554-1400

Facsimile: (212) 554-1444

salvatore@blbglaw.com

jim.harrod@blbglaw.com

adam@blbglaw.com

rebecca.boon@blbglaw.com

Counsel for Lead Plaintiff and for the

Class

E. Powell Miller (P39487)

Marc L. Newman (P51393)

THE MILLER LAW FIRM, P.C.

950 West University Drive, Suite 300

Rochester, MI 48307

Telephone: (248) 841-2200 Facsimile: (248) 652-2852 epm@millerlawpc.com

mln@millerlawpc.com

Local Counsel for Lead Plaintiff and for the Class

<u>ORDER</u>

IT IS SO ORDERED.

Dated: January 15, 2015

/s/ Timothy A. Duffy

Raymond W. Henney

HONIGMAN MILLER

SCHWARTZ AND COHN LLP

660 Woodward Avenue,

Suite 2290

Detroit, MI 48226-3506

Telephone: (313) 465-7410

Facsimile: (313) 465-7411

rwh@honigman.com

Robert J. Kopecky

Timothy A. Duffy

KIRKLAND & ELLIS

200 E. Randolph Drive

Chicago, IL 60601

Telephone: (312) 861-2000

Facsimile: (312) 861-2084 rkopecky@kirkland.com

tduffy@kirkland.com

Attorneys for Defendants

Dated: January 14, 2015

LINDA V. PARKER

U.S. DISTRICT JUDGE

EXHIBIT A

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

NEW YORK STATE TEACHERS' RETIREMENT SYSTEM, Individually and on Behalf of All Others Persons Similarly Situated, Civil Case No. 14-cv-11191 Honorable Linda V. Parker

Plaintiff,

v.

GENERAL MOTORS COMPANY, DANIEL F. AKERSON, DANIEL AMMANN, and MARY T. BARRA,

Defendants.